

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

Christian Healthcare Centers, Inc.

Plaintiff,

v.

Dana Nessel, in her official capacity as Attorney General of Michigan; **John E. Johnson, Jr.**, in his official capacity as Executive Director of the Michigan Department of Civil Rights; **Portia L. Roberson, Zenna Faraj Elhasan, Gloria E. Lara, Regina Gasco-Bentley, Anupama Kosaraju, Richard Corriveau, and David Worthams**, in their official capacities as members of the Michigan Civil Rights Commission.

Defendants.

Case No. 1:22-cv-00787-JMB-PTG

**Jessica Hoff's Declaration in
Support of Plaintiff's Motion
for Reconsideration**

I, Jessica Hoff, declare as follows:

1. I am over the age of eighteen and competent to testify to the matters discussed in this Declaration. All of the following testimony is based on my personal knowledge.
2. I am an attorney licensed to practice law in Michigan.
3. I submitted Freedom of Information Act ("FOIA") requests to Michigan's Department of Civil Rights ("Department") in July 2022 and November 2022.
4. I also corresponded with the Department multiple times in January, February, and March 2023 regarding those requests.
5. In response to those requests, I received several letters, documents, and transcripts from the Department.

6. I previously described some of those documents in my declaration filed on December 22, 2022.

7. Because the Department presented to the Court documents related to bona fide occupational qualification (“BFOQ”) decisions “that current staff were unable to locate, which included four BFOQ applicants, spanning from 2003 to 2010, where BFOQs based on religion or sex were granted,” I updated my FOIA request in February 2023 to expressly include BFOQ decisions from all time periods.

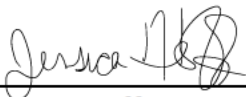
8. In March 2023, I received more than 800 additional pages of responsive documents related to BFOQ decisions.

9. True and correct copies of some of those documents related to the BFOQ exemptions are in the Appendix at 324-361.

Declaration Under Penalty of Perjury

I, Jessica Hoff, a citizen of the United States and a resident of the State of Michigan, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge.

Executed this 3rd day of April, 2023, at Kent County, Michigan.

s/ 
Jessica Hoff